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16		Class Counsel for Plaintiffs
17	[Additional counsel on signature page]	
18	UNITED STATI	ES DISTRICT COURT
19	NORTHERN DIST	TRICT OF CALIFORNIA
20	OAKLA	AND DIVISION
21	IN RE COLLEGE ATHLETE NIL	Case No. 4:20-cv-03919-CW
22	LITIGATION	STIPULATION AND [PROPOSED] ORDER
23		REGARDING FILING OF SECOND CONSOLIDATED AMENDED CLASS
24		ACTION COMPLAINT
25		Hon. Claudia Wilken
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1	Pursuant to Northern District of California Civil Local Rule 7-12 and Federal Rule of Civil
2	Procedure 15(a)(2), Plaintiffs in the above-captioned action and Defendants National Collegiate
3	Athletic Association, Atlantic Coast Conference, The Big Ten Conference, Inc., The Big 12
4	Conference, Inc., Pac-12 Conference, and Southeastern Conference (collectively, "Defendants," and
5	together with Plaintiffs, the "Parties"), by and through their respective undersigned counsel, hereby
6	submit the following Stipulation to permit the Plaintiffs to file the Second Consolidated Amended
7	Class Action Complaint submitted herewith:
8	WHEREAS, on June 15, 2020, Plaintiffs filed the Class Action Complaint. ECF No. 1;
9	WHEREAS, on July 26, 2021, Plaintiffs timely filed the Consolidated Amended Class Action
10	Complaint. ECF No. 164;
11	WHEREAS, Plaintiffs seek to supplement their claims to challenge all of Defendants
12	restraints on college-athlete compensation and benefits—including, but not limited to, compensation
13	for name, image and likeness and "pay-for-play"—and Defendants' rules restricting the number and
14	overall amount of athletic scholarships, as well as to add Plaintiffs and classes;
15	WHEREAS, the Defendants consent to Plaintiffs' request to file the Second Consolidated
16	Amended Class Action Complaint submitted herewith as Exhibit 1 and in redline format as Exhibit 2
17	for purposes of facilitating the resolution of this matter; and
18	WHEREAS, the Parties agree that Defendants do not need to file a pleading in response to the
19	Second Consolidated Amended Class Action Complaint.
20	THEREFORE, the Parties hereby agree and stipulate that, upon order of this Court:
21	• Pursuant to Federal Rule of Civil Procedure 15(a)(2), Defendants consent to Plaintiff
22	filing the Second Consolidated Amended Class Action Complaint submitted herewith a
23	Exhibit 1, which shall become the operative complaint; and
24	Defendants shall not be required to file a pleading in response to the Second Consolidated
25	Amended Class Action Complaint.
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1	Dated: July 26, 2024	Respectfully submitted,
2	HAGENS BERMAN SOBOL SHAPIRO LLP	WINSTON & STRAWN LLP
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1	ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)
2	Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the
3	filing of this document has been obtained from the signatories above.
4	/a/ C4 W. D
5	/s/ Steve W. Berman STEVE W. BERMAN
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	[PROPOSED] ORDER
PURSUANT TO S	STIPULATION, IT IS SO ORDERED.
Dated:	HON. CLAUDIA WILKEN
	UNITED STATES DISTRICT COURT JUDGE
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